



# Code of Conduct for School Staff

Policy Level	Trust	Ref No	ADM01
Approved by	Trust Board	Approved date	Summer 2025
Responsibility	Deputy CEO	Next review	Summer Term 2026
Reviewed by	R Leonard	Date Issued	Autumn 2025

## Contents

1. INTRODUCTION .....	4
2. OBJECTIVE, SCOPE AND PURPOSE .....	5
3. LEGALISATION AND GUIDANCE .....	5
4. GENERAL OBLIGATIONS .....	5
5. SAFEGUARDING .....	6
6. SEXUAL HARRASSMENT .....	7
7. STAFF / PUPIL RELATIONSHIPS .....	8
8. ACCEPTABLE USE OF TECHNOLOGY AND SOCIAL MEDIA .....	9
9. CONFIDENTIALITY .....	9
10. HONESTY AND INTEGRITY .....	7
11. DRESS CODE .....	10
12. CONDUCT OUTSIDE OF WORK .....	10
13. HEALTH AND SAFETY.....	10
14. EQUALITY .....	10
15. PUBLICATIONS AND DEALING WITH THE PRESS .....	10
16. APPENDIX 1 STAFF DECLARATION FORM .....	11

Document Control	
Title	Code of Conduct
Main amendments	<p>Introduction - removed reference to the trust being AP and special schools</p> <p>Legislation and guidance – added link to governance guide for academy trusts</p> <p>Safeguarding – Added additional information on allegations that meet the harm threshold, low level concerns and whistleblowing</p> <p>Added a new section on sexual harassment</p> <p>Gifts and hospitality – Added “<i>Staff will not accept bribes. Gifts that are worth more than £25 must be declared to the CFOO and recorded on the gifts and hospitality register</i>” as per the gifts and hospitality policy</p> <p>Remove section on security as not relevant or required within this policy</p> <p>Remove reference to <i>Other employment, managerial roles and responsibilities and following reasonable management requests</i> as not required to be in this policy.</p> <p>Replaced reference to Headteacher with Line manager throughout</p> <p>Acceptable use of ICT- Added that we monitor use of school WIFI</p>

## 1. Introduction

The Bolton Impact Trust is a multi-academy trust. We think that our Trust is a very special place where we respect individuality, diversity and difference. We believe in positive regard for all and we actively promote the key principles of warmth, respect and harmony.

We are a Trust who are proud of our core beliefs and values:

**We believe everyone can achieve.**

**We inspire a love of learning**

**We transform potential into long-lasting success.**

At the Bolton Impact Trust we seek to provide a safe and supportive environment which secures the wellbeing and very best outcomes for our pupils and the staff in our care. We recognise that our teaching and support staff are our most important assets and we wish to support them fully to thrive both personally and professionally. We recognise that there is a correlation between the wellbeing of staff and the wellbeing of pupils, and as such, we wish to create a whole trust approach for staff and pupils in respect to wellbeing.

This code of conduct applies to all employees at the Bolton Impact Trust and should clarify what is expected in terms of professional behaviour and standards that we expect all employees to follow.

Although the code does not directly apply to contractors, consultants, agency staff or volunteers, the academies continued association with these individuals requires them to observe and comply with the code.

The code of conduct is supported by a number of other individual policies which outline your obligations and provide guidance on standards of behaviour. These include, but are not limited to, the Disciplinary and Dismissal policy, Safeguarding/Child Protection Policy, Acceptable Use of ICT Policy, Safer Recruitment Disclosure and Barring, Social Media Policy and the Whistleblowing policy. These policies can be found on the trust website.

Please note that this document is not exhaustive. The Code does not attempt to provide an exhaustive list of what to do in every aspect of your work, but represents a broad framework within which staff are expected to conduct themselves.

Breaches of the code and standards set by the trust and its academies will ordinarily result in disciplinary action being taken. Please raise any queries about the content of the policy with your line manager as soon as possible to avoid any doubt.

In line with the Education Act 2002, the Trust Board and Local Governing Bodies of Bolton Impact Trust have a duty to exercise their function with a view to safeguarding and promoting welfare of children.

This obligation is further outlined within the statutory guidance, 'Keeping Children Safe in Education' (to which all schools must have regard) which stipulates the role that school staff must play in safeguarding pupils. Furthermore, in line with this statutory guidance, schools should have a staff behaviour policy or code of conduct, which should be provided to all staff.

In order to adhere to these obligations and to ensure that safeguarding children is at the focus of Bolton Impact Trust this code of conduct has been compiled.

## 2. Objective, Scope and Purpose

The code of conduct establishes the clear standards of behaviour that are expected of all school staff, and clearly enables staff to understand what is and is not acceptable.

The purpose of this code of conduct is:

- to ensure that staff to act as role models within their professional capacity;
- to ensure that staff maintain their own professional reputation;
- maintain the reputation of the trust and its academies and;
- to ensure that conduct and behaviour of all staff both safeguards and sets the example for pupils and students.

Staff should understand the responsibilities and behaviours that are a fundamental part of their role in school. This code of conduct cannot be exhaustive. In addition to the actions and behaviours identified within this code of conduct, staff should ensure they continuously exercise their professional judgement in work and their personal life and avoid any conduct which may be in contravention with their professional role and responsibilities, and/or the ethos of the trust and its schools.

## 3. Legislation and Guidance

We must have a policy on staff behaviour, as explained in the Department for Education's [governance guide for academy trusts](#).

In line with the statutory safeguarding guidance [Keeping Children Safe in Education](#), we should have a staff code of conduct, which should (among other things) cover low-level concerns, allegations against staff and whistle-blowing, as well as acceptable use of technologies (including the use of mobile devices), staff/pupil relationships and communications, including the use of social media.

This policy also complies with our funding agreement and articles of association.

School staff work within the public sector, delivering public education, and are consequently accountable for the ethical and high quality delivery of this public service. Therefore, in addition to this policy, staff are expected to adhere to the 7 principles of public life (the Nolan principles 1995), established by the Committee on Standards in Public Life; ***selflessness, integrity, objectivity, accountability, openness, honesty and leadership.***

## 4. General Obligations

All staff are to set an example to pupils. They will:

- Attend work in a condition where you are able to carry out your duties safely and effectively
- Act honestly and with dignity, and always treat others with dignity and respect
- Never use inappropriate or offensive language in school
- Show tolerance and respect for the rights of others
- Not undermine fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs
- Understand the statutory frameworks they must act within
- Work in accordance with the terms and conditions of your contract of employment

- Ensure all policies and requirements in your role are followed, including the requirement for data protection and sensitivity around confidential information.
- Adhere to the Teachers' Standards
- Adhere to the Teaching Assistant Standards 2016

## 5. Safeguarding

Staff have a duty to safeguard pupils from harm, and to report any concerns they have. This includes physical, emotional and sexual abuse, and neglect.

Staff will familiarise themselves with our child protection and safeguarding policy and procedures, and the Prevent initiative, and ensure they are aware of the processes to follow if they have concerns about a child.

Our child protection and safeguarding policy and procedures are available on our website and new staff will also be given copies on arrival.

### 5.1 Allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that anyone working in the trust/school, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place inside or outside of school

We will deal with any allegation of abuse quickly and in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation.

### 5.2 Low-level concerns about members of staff

A low-level concern is a behaviour towards a child by a member of staff that does not meet the harm threshold, but is inconsistent with the staff code of conduct, and may be as simple as causing a sense of unease or a 'nagging doubt'. For example, this may include:

- Being over-friendly with children
- Having favourites
- Taking photographs of children on a personal device
- Engaging in 1-to-1 activities where they can't easily be seen
- Humiliating pupils

Low-level concerns can include inappropriate conduct inside and outside of work.

All staff should share any low-level concerns they have using the reporting procedures set out in our managing allegations and low level concerns policy. We also encourage staff to self-refer if they find themselves in a situation that could be misinterpreted. If staff are not sure whether behaviour would be deemed a low-level concern, we encourage staff to report it.

All reports will be handled in a responsive, sensitive and proportionate way.

Unprofessional behaviour will be addressed, and the staff member supported to correct it, at an early stage.

This creates and embeds a culture of openness, trust and transparency in which our values and expected behaviour are constantly lived, monitored and reinforced by all staff, while minimising the risk of abuse.

Reporting and responding to low-level concerns is covered in more detail in managing allegations and low level concerns policy which can be found on our website.

Our procedures for dealing with allegations will be applied with common sense and judgement.

### 5.3 Whistleblowing

Whistleblowing reports wrongdoing that it is “in the public interest”. Examples linked to safeguarding include:

- Pupils’ or staff members’ health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Attempts to cover up the above, or any other wrongdoing in the public interest

Staff are encouraged to report suspected wrongdoing as soon as possible. Their concerns will be taken seriously and investigated, and their confidentiality will be respected. The trust aims to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Staff should consider the examples above when deciding whether their concern is of a whistle-blowing nature. Consider whether the incident(s) was illegal, breached statutory or trust procedures, put people in danger or was an attempt to cover any such activity up.

Staff should report their concern to the head teacher/academy lead. If the concern is about the head teacher/academy lead or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to chair of the LGB or Trust board.

Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter. The trust will then investigate any complaints in a timely, respectful and confidential manner.

For our trust’s detailed whistle-blowing process, please refer to our whistle-blowing policy.

## 6. Sexual harassment

Sexual harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature that has a purpose or effect of violating a person’s dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. It also includes treating someone less favorably because they’ve submitted or refused to submit to unwanted conduct of a sexual nature in the past, or harassment related to sex or gender reassignment. When this behaviour is unwanted, it includes (but isn’t limited to):

- Unwanted physical conduct or “horseplay” including touching, pinching, pushing and grabbing
- Continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome
- Sending or displaying material that is pornographic or that some people might find offensive
- Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless)

- Offensive emails, text messages or social media content
- Comments and jokes of a sexual nature
- Sexually suggestive looks and staring
- Sexual propositions and advances
- Promising things in return for sexual favours
- Physical contact such as massaging, hugging or kissing
- Sexual contact on social media

Staff will help create a positive environment that works to prevent sexual harassment. This includes calling out sexual harassment that they witness. All witnesses will be provided with appropriate support and will be protected from victimisation.

If a staff member is concerned at any point about incidents of sexual harassment (either directed at them or someone else), they should report their concern to the Head teacher/Academy Lead/Director of Academy Operations. If the concern is about the Head teacher/Academy Lead or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to LGB Chair or Chair of Trustees. The trust will investigate any complaints in a timely, respectful and confidential manner.

All staff will receive training on recognising and responding to incidents of sexual harassment. The trust will monitor the treatment and outcomes of any complaints of sexual harassment or victimisation received to ensure that they are properly investigated and resolved, those who report or act as witnesses are not victimised, repeat offenders are dealt with appropriately, cultural clashes are identified and resolved and workforce training is targeted where needed.

## 7. Staff / Pupil Relationships

All staff will observe proper boundaries with pupils that are appropriate to their professional position. They will act in a fair and transparent way that would not lead anyone to reasonably assume they are not doing so.

If staff members and pupils must spend time on a one-to-one basis, staff will ensure that:

- This takes place in a public place that others can access
- Others can see into the room
- A colleague or line manager knows this is taking place

All staff should avoid contact with pupils outside of school hours if possible.

Personal contact details including social media profiles should not be exchanged between staff and pupils, and pupils should only be contacted by staff via the school's approved mechanisms. If staff are contacted by students/pupils via an inappropriate route, they must report this to their line manager immediately.

Staff social media profiles should not be available to pupils, and strict security settings must be in place on any social media profiles. Staff must not contact or seek to contact pupils, parents, or any other school stakeholder via social media. Staff will follow the Trust's Social Media Policy and refer to section 7 below, "Acceptable use of technology and social media."

All staff must comply with the Bribery Act 2010. A person may be guilty of an offence of bribery under this act if they offer, promise, or give financial advantage or other advantage to someone; or if they request, agree, or accept, or receive a bribe from another person. If you believe that a person has failed to comply with the Bribery Act, this should be reported in accordance with the

Trust's Whistleblowing procedure. While we are aware many pupils and their parents may wish to give gifts to staff, for example, at the end of the school year, gifts from staff to pupils are not acceptable.

If a staff member is concerned at any point that an interaction between themselves and a pupil may be misinterpreted, this should be reported to their line manager immediately.

## 8. Acceptable use of Technology and Social Media

This should be read in conjunction with the Trust's social media and Acceptable use of ICT policies. Staff must use school IT equipment responsibility and for professional purposes only, this includes use of school email and mobile phone, if applicable. Staff will not use school technology to view material that is illegal, inappropriate, or likely to be deemed offensive. This includes, but is not limited to, sending obscene emails, gambling, and viewing pornography or other inappropriate content. Staff must follow all school procedures for appropriately accessing and using school IT equipment.

Staff will not use personal mobile phones and laptops, or school equipment for personal use, in school hours or in front of pupils. They will also not use personal mobile phones or cameras to take pictures of pupils.

Staff must be aware of the trust's social media policy. They must act as responsible users of social media and be aware that they are accountable for any information or views expressed on social media or other internet sites. This includes views expressed directly and through affiliation, such as 'liking' a post or page. Staff must not engage in any internet or social media usage that may bring the school, trust or any school stakeholder into disrepute, or that questions their professionalism or suitability to work with children.

Staff will ensure that they do not post any images online that identify children who are pupils within the trust without their consent.

We have the right to monitor emails and internet use on the school IT system including school WIFI.

## 9. Confidentiality

In the course of their role, members of staff are often privy to sensitive and confidential information about the school, trust, staff, pupils, and their parents.

This information will never be:

- Disclosed to anyone without the relevant authority
- Used to humiliate, embarrass, or blackmail others
- Used for a purpose other than what it was collected and intended for
- Removed from the school premises without the express consent of a member of the senior leadership team in writing
- If you are authorised to take documentation or equipment off site then you must ensure you keep such items secure at all times and follow the trust's Data Protection policy.

This does not overrule staff's duty to report child protection concerns to the appropriate channel where staff believe a child is at risk of harm.

## **10. Honesty and Integrity**

Staff should maintain high standards of honesty and integrity in their role. This includes when dealing with pupils, handling money, claiming expenses and using the trust's property and facilities.

Staff will not accept bribes. Gifts that are worth more than £25 must be declared to the CFOO and recorded on the gifts and hospitality register

Staff will ensure that all information given to the trust is correct. This should include:

- Background information (including any past or current investigations/cautions related to conduct outside of school)
- Qualifications
- Professional experience

Where there are any updates to the information provided to the trust, the member of staff will advise the trust as such as soon as reasonably practicable. Consideration will then be given to the nature and circumstances of the matter and whether this may have an impact on the member of staff's employment.

## **11. Dress code**

Staff will dress in a professional, appropriate manner, taking into consideration the workplace health and safety requirements of your role.

Outfits will not be overly revealing, and staff must not present themselves in a manner that may offend, including the display of any offensive or political slogans. Further details regarding staff dress can be found in the school staff handbook.

## **12. Conduct outside of work**

Staff will not act in a way that would bring the school, trust or the teaching profession into disrepute. This covers relevant criminal offences, such as violence or sexual misconduct, as well as negative comments about the school or trust on social media.

## **13. Health and Safety**

The trust and its schools recognises and accepts its responsibility for providing a safe and healthy environment for all staff, students, and visitors who attend our premises. You are responsible for ensuring the health and safety of yourself and others who may be affected by your actions. Please ensure you familiarise yourself with the schools health and safety policy which can be found on the website.

## **14. Equality**

The trust and its schools holds its obligations in line with the Equality Act 2010 and the Public Sector Equality Duty with utmost importance. The trust and school's equality objectives can be located on the trust website.

## **15. Publication and dealing with the press**

If staff are approached by the media in relation to any academy or trust issues, this must be escalated to the Director of Academy Operations or Chief Executive Officer immediately. Staff must not provide any statements or comments to the media without authorisation from the Director of Academy Operations or Chief Executive Officer to do so.

## **Appendix 1 – Staff Confirmation Sheet**

The Trust Board and Local Governing Bodies requires all staff to read, understand and abide by the Code of Conduct.

If there are any aspects of the Code of Conduct that you do not understand, please contact your line manager or the Headteacher to discuss this further.

I, ..... (PRINT NAME) confirm that I have read and understand the trust's code of conduct

Signature.....

Date .....

Please return this page to your office supervisor. This information will be retained on your personnel file.